

Exhibit B

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March 13, 2025

VIA ELECTRONIC MAIL

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Re: Lively v. Wayfarer Studios, No. 1:24-cv-10049-LJL, Subpoena to Edgeworth Security Services LLC

Dear Counsel:

We write on behalf of our clients, Jonesworks LLC and Stephanie Jones (collectively “Jonesworks”) regarding the subpoena recently served by Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, It Ends With Us Movie LLC, Melissa Nathan, Jennifer Abel, and Steve Sarowitz on Edgeworth Security Services LLC (“Edgeworth”) in the above-captioned matter. Pursuant to Federal Rule of Civil Procedure 45, Jonesworks objects to the subpoena for the reasons stated below.

Among the subpoena’s seventeen requests for production, requests number 1, 2, 3, and 4 call for documents and communications between Edgeworth and Jonesworks or regarding Jonesworks. Request for production 5 calls for documents and communications concerning Jennifer Abel, a former partner of Jonesworks. Jonesworks objects to each of these requests in their entirety as each calls exclusively for documents and communications that are protected by the attorney-client privilege and the work product doctrine. Jonesworks likewise objects to requests for production 6-13 in the subpoena to the extent such request might be interpreted as calling for the production of communications with or documents relating to Jonesworks or any of its current or former employees.

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Jonesworks retained Edgeworth in anticipation of litigation and to prepare for foreseeable litigation. Jonesworks has no other relationship with Edgeworth, and Edgeworth has not performed any other services for Jonesworks. Based on this relationship, all documents in the possession, custody or control of Edgeworth that relate to Jonesworks or communications with Jonesworks are protected from disclosure. *See Fed. R. Civ. P. 26(b)(4)(D); see also, e.g., United States v. Mejia*, 655 F.3d 126, 132 (2d Cir. 2011) (attorney-client privilege extends to communications with non-attorneys “when the purpose of the communication is to assist the attorney in rendering advice to the client” (quoting *United States v. Adlman*, 68 F.3d 1495, 1499 (2d Cir.1995)); *Williams v. Bridgeport Music, Inc.*, 300 F.R.D. 120, 123 (S.D.N.Y. 2014) (“[T]he work-product doctrine applies to work product by a party or its representatives, including the “party's attorney, consultants, surety, indemnitor, insurer, or agent.””); *Gucci Am., Inc. v. Guess?, Inc.*, 271 F.R.D. 58, 70 (S.D.N.Y. 2010) (“[C]ourts have frequently extended the attorney-client privilege to communications made to investigators who have provided necessary assistance to attorneys.”); *Pearlstein v. BlackBerry Ltd.*, No. 13-CV-7060 (CM) (KHP), 2019 WL 1259382, at *4 (S.D.N.Y. Mar. 19, 2019) (“Courts also have applied the privilege to communications among non-lawyer employees of a corporation where the purpose of the communication was to provide information to counsel or aid counsel in providing legal advice.”)).

Please confirm in writing that your clients will withdraw the subpoena to Edgeworth to the extent that it calls for documents and communications with or about Jonesworks or any of its current or former employees.

Regards,



Kristin Tahler

Copy to: Daryl Crone, Counsel for Edgeworth Security Services LLC
All Counsel of Record